

## **Title V**

### **Model General Permit Template**

#### **SERIES 15 Tanks**

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#### **Template # SJV-TK-15-0**

**external floating roof tank**

**tank has a storage capacity of greater than 40,000 gallons and is not used  
for petroleum or condensate stored, processed or treated prior to custody  
transfer**

**or**

**tank has a storage capacity of 420,000 gallons or greater**

**construction, modification or reconstruction commenced between  
May 18, 1978 and July 23, 1984**

**exempt from District Rule 4623, Section 5.1, 5.2, & 5.3**

**true vapor pressure greater than 1.5 psia  
and less than 11 psia**

This template is designed to streamline the Title V permitting process for tanks meeting the above qualifications. Applicants for Title V permits choosing to use this template will only have to complete the enclosed template qualification form and submit it with their Title V application.

# **San Joaquin Valley Unified Air Pollution Control District**

## **Final Title V Model General Permit Template Series 15 Tanks**

**Template No: SJV-TK-15-0**

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**FINAL DECISION DATE:**

**3/13/97**

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# **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT**

## **TITLE V GENERAL PERMIT TEMPLATE SJV-TK-15-0**

### **ENGINEERING EVALUATION**

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# Template SJV-TK-15-0

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## I. Purpose

The purpose of the proposed template is to streamline the Title V permitting process and reduce the time required by the applicant and the District by identifying the federally applicable requirements for tanks and establishing permit conditions which will ensure compliance with such requirements. These conditions will be incorporated into the Title V permit of any facility choosing to make use of the template.

## II. Template Applicability

The template applies to any tank which:

Has an external floating roof, and

Has a true vapor pressure greater than 1.5 psia but less than 11 psia, and

Commenced construction, modification, or reconstruction between May 18, 1978 and July 23, 1984, and either of the following;

A. Has a storage capacity greater than 40,000 gallons and is not used for petroleum or condensate stored , processed or treated prior to custody transfer, or

B. Has a storage capacity greater than 420,000 gallons.

The applicability of this template is determined by completion of the Template Qualification Form (TQF) attached as Appendix C. The completed and signed TQF for each qualifying unit must be submitted with the Title V application.

## III. Applicable Requirements

Units may be subject to “federally enforceable” requirements as well as requirements that are enforceable by the “District-only”. Federally enforceable requirements will be enforceable by the EPA, the District, and the public through Title V permit conditions identified as federally enforceable. District-only requirements represent local or state regulations for which the EPA has no direct enforcement authority. The final Title V permits issued by the District will contain both federally enforceable and District-only requirements.

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District-only requirements are not addressed in this template except for those used in streamlining of multiple requirements. District-only requirements used in streamlining of multiple requirements will become federally enforceable. Table 1, Applicable Requirements, does not necessarily include all federally enforceable requirements that apply to tanks qualifying to use this template, and it is the source's responsibility to determine any and all applicable requirements to which the source is subject. Generally, requirements not addressed by this template are those that require a source-specific analysis, or are covered by other templates.

**Table 1 Applicable Requirements**

Rule Category	Rule/Regulation	Citation	Description
A	NSPS Subpart Ka	40CFR60 60.110a	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 , and Prior to July 23, 1984
A	SJVUAPCD Reg. IV	4623 except Section 5.1, 5.2 & 5.3	Storage of Organic Liquids
A	SJVUAPCD Reg. II	2520, 9.5.2	Federally Mandated Operating Permits
B	SJVUAPCD Reg. II	2201	New Source Review Rule
B	SJVUAPCD Reg. II	2520	Federally Mandated Operating Permits
B	SJVUAPCD Reg. IV	4101	Visible Emissions
B	NESHAP, Subpart CC	40CFR63	Petroleum Refineries
B	NESHAP, Subpart F	40CFR63	Synthetic Organic Chemical Manufacturing Industry
B	NESHAP, Subpart I	40CFR63	Certain Processes Subject to the Negotiated Regulation for Equipment Leaks
C	SJVUAPCD Reg. IV	4623, 5.1, 5.2, & 5.3	Storage of Organic Liquids
C	SJVUAPCD Reg. IV	4661	Organic Solvents
C	SJVUAPCD Reg. IV	4801	Sulfur Compounds
C	NSPS Subpart K	40CFR60 60.110	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978
C	NSPS Subpart Kb	40CFR60 60.110b	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification commenced after July 23, 1984

Category "A" rules contain requirements that are directly applicable to the qualifying units; compliance with these applicable requirements will be demonstrated in this engineering evaluation and assured by the template permit conditions. In section IV, Compliance, the federally-enforceable requirements from category "A" rules are listed with a discussion of how compliance with these requirements is achieved.

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Category “B” rules contain federally enforceable requirements that were not addressed in this template. These may not be all of the federally enforceable requirements for this unit. Requirements from these rules must be addressed by the applicant outside of this template within the Title V application Compliance Plan form (TVFORM-004). Category “B” listing is included in this table as an informational item to assist applicants in this effort.

Category “C” rules contain requirements which have been determined not to be applicable to qualifying units. A permit shield is proposed for the category “C” rules. An explanation of the determination of non-applicability of category “C” rules is included in the permit shield section of this evaluation.

## **IV. Compliance**

This section contains a discussion of how compliance is assured with each requirement addressed in this template.

### 40CFR60, 60.110a

This section requires that any storage vessel in the storage capacity and true vapor pressure range covered by this template be equipped with either a floating roof, a vapor recovery system, or its equivalent. Tanks covered by this template are required to be equipped with an external floating roof meeting the specifications of 40CFR60, Subpart Ka. Template permit conditions will be added to require that tanks covered by this template are equipped with an external floating roof and proper closure seals. Template permit conditions will also be added for associated monitoring and recordkeeping requirements. See template permit conditions #1-19, #22-29, #32, and #33.

### District Rule 4623

District Rule 4623 has been submitted to the EPA to replace the old District Rule 463.2 which is SIP approved. Appendix B lists all of the applicable requirements of District Rule 4623 and shows which are included in the rule from the old SIP approved rule. This table shows that District Rule 4623 is as stringent as rule 463.2, thus rule 463.2 will be subsumed by rule 4623 for the purposes of this template.

Section 2.0 states that this rule is only applicable to equipment used to store organic liquids, including crude oil and petroleum distillates, with a true vapor pressure of greater than 1.5 psia.

Section 6.0 requires periodic monitoring, testing and recordkeeping of tanks covered by this template. Periodic monitoring such as maintaining a record of the liquid stored, the storage temperature, the Reid vapor pressure of that liquid

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during the respective storage period, and associated testing will be required. See template permit conditions #19-20, #30 and #31.

## District Rule 2520, 9.5.2

Section 9.5.2 requires all records be maintained for at least five years. Template permit condition #21 requires that all records be maintained for at least five years.

## **V. Permit Shield**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Title V permit is considered compliance with all applicable requirements upon which those conditions are based. A permit shield is requested in template permit condition #34.

A permit shield will also be granted for 40CFR60 Subpart K and Kb because facilities qualifying to use this template commenced construction, modification, or reconstruction between May 18, 1978 and July 23, 1984. These rules only apply to units that commence construction, modification, or reconstruction before or after this period. A permit shield is granted from these requirements in template permit condition #35.

A permit shield will also be granted for District Rule 4623, 5.0. Units qualifying to use this template must be the following:

1. Emergency standby tanks, storage not exceeding 30 days at a time, in existence prior to May 1, 1979, which store exclusively petroleum distillates or crude oil.

Tanks in this category are exempt from District Rule 4623, Sections 5.1, 5.2 and 5.3. Tanks with a storage capacity greater than 19,800 gallons are exempt from Section 5.4. Tanks qualifying to use this template must have storage capacity greater than 40,000 gallons. Therefore, Section 5.0 (Requirements) of District Rule 4623 does not apply to units covered by this template. A permit shield is granted from this requirement in template permit condition #36.

A permit shield will also be granted for District Rule 4661. The provisions of this rule are limited to organic solvents. Organic solvents are defined in this rule as organic materials which are liquids at standard conditions and which are used as dissolvers, viscosity reducers or cleaning agents. Tanks storing these liquids are excluded from this template in the template qualification form (see Appendix C). Therefore, this rule does not apply to units covered by this template. A permit shield is granted from this requirement in template permit condition #36.

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A permit shield will also be granted for District Rule 4801. This rule specifies testing requirements for a stack source. Tank emissions are fugitive emissions not considered to come from a point source. Therefore, this rule does not apply to units covered by this template. A permit shield is granted from this requirement in template permit condition #36.

## VI. Permit Conditions

The following conditions will be incorporated into the Title V permit of any facility choosing to make use of template #SJV-TK-15-0:

1. True vapor pressure of the liquid stored shall not exceed 11 psia [40CFR 60.112a]
2. Storage vessel shall be equipped with a cover consisting of either a pontoon-type or double-deck-type cover which rests upon the surface of the liquid being stored and is equipped with a closure device between the tank wall and roof edge. [40CFR 60.112a]
3. Roof shall be floating on the liquid (ie., off the roof leg supports) at all times except during initial fill and when tank is completely emptied and subsequently refilled. [40CFR 60.112a]
4. Closure device shall consist of a primary and a secondary seal. [40CFR 60.112a]
5. Primary seal (lower seal) shall be either a metallic shoe seal, a liquid-mounted seal, or a vapor-mounted seal. [40CFR 60.112a]
6. If the primary seal used is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 24 inches above the stored liquid surface. [40CFR 60.112a]
7. Accumulated area of gaps between tank wall and primary seal shall not exceed: 1)  $10.0 \text{ in}^2$  per foot of tank diameter and the width of any portion of any gap shall not exceed one and one-half (1-1/2) inch, for a metallic shoe seal or a liquid-mounted seal; and 2)  $1.0 \text{ in}^2$  per foot of tank diameter and the width of any portion of any gap shall not exceed one-half (1/2) inch for a vapor mounted seal. [40CFR 60.112a]
8. Primary seal shall not have any holes, tears, or other openings in the shoe, seal fabric, or seal envelope. [40CFR 60.112a]
9. Secondary seal shall be installed above the primary seal. [40CFR 60.112a]



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10. If the secondary seal is used in combination with a metallic shoe or liquid-mounted primary seal, accumulated area of gaps between tank wall and the secondary seal shall not exceed 1.0 in<sup>2</sup> per foot of tank diameter and the width of any portion of any gap shall not exceed one-half (1/2) inch. [40CFR 60.112a]
11. If the secondary seal is used in combination with a vapor-mounted primary seal, there shall be no gaps between the tank wall and the secondary seal. [40CFR 60.112a]
12. There shall be no holes, tears or other openings in the seal or seal fabric of the secondary seal. [40CFR 60.112a]
13. Operator shall be exempt from the requirements for secondary seals and the secondary seal gap criteria when performing gap measurements or inspections of the primary seal. [40CFR 60.112a]
14. Each opening in the roof except for automatic bleeder vents and rim space vents shall provide a projection below the liquid surface. [40CFR 60.112a]
15. Each opening in the roof except for automatic bleeder vents, rim space vents, and leg sleeves shall be equipped with a cover, seal or lid which is to be maintained in a closed position at all times (ie, no visible gap) except when the device is in actual use. [40CFR 60.112a]
16. Automatic bleeder vents shall be closed at all times when the roof is floating, except when the roof is being floated off or is being landed on the roof leg supports. [40CFR 60.112a]
17. Rim vents shall be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting. [40CFR 60.112a]
18. Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. [40CFR 60.112a]
19. Operator shall keep a record of liquids stored in each container, period of storage, storage temperature, maximum true vapor pressure, and the Reid vapor pressure of such liquids. [40CFR 60.115a(a) and District Rule 4623, 6.1]
20. For any tank designated for emergency standby, in existence prior to May 1, 1979, and which stores exclusively petroleum distillate or crude oil, the following shall also apply: 1) Each use of the tank shall not exceed 30 days and, prior to returning the tank to emergency status, the tank shall be thoroughly drained; 2) After a tank has been used (filled or partially filled) and draining of the tank has begun, any further filling of the tank shall constitute a separate use of the tank;

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and 3) Operator shall record liquids stored in each container, storage temperature, Reid vapor pressure of liquids, the date(s) liquid is first introduced into the tank, and date(s) tank is fully drained. Such records shall be submitted to the APCO 60 days prior to permit renewal. [District Rule 4623, 6.1.2 & 4.2.1]

21. The operator of a floating roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2]

22. Operator shall perform gap measurements on primary seals within 60 days of the initial fill with petroleum liquid and at least once every 5 years thereafter. [40CFR 60.113a(1)(i)(A)]

23. Operator shall perform gap measurements on secondary seals within 60 days of the initial fill with petroleum liquid and at least once every year thereafter. [40CFR 60.113a(1)(i)(B)]

24. If unit is out of service for a period of one year or more, subsequent refilling with petroleum liquid shall be considered initial fill in accordance with the conditions of this permit. [40CFR 60.113a(1)(i)(C)]

25. The process of emptying and refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. [40CFR 60.112a(a)(1)]

26. Operator shall notify the APCO 30 days in advance of any gap measurements required by this permit to afford the APCO opportunity to have an observer present. [40CFR 60.113a(a)(1)(iv)]

27. Operator shall record the vessel on which the seal gap measurement was performed, date of the seal gap measurement, raw data obtained in the measurement process, in accordance with the conditions of this permit. [40CFR 60.113a(1)(i)(D)]

28. Operator shall determine gap widths in the primary and secondary seals using the following procedure: 1) Measure seal gaps, at one or more floating roof levels when the roof is floating off leg supports; 2) Measure seal gaps around entire circumference of the tank in each place where a one-eighth (1/8) inch diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the tank wall and measure the circumferential distance of each such location; 3) Total surface area of each gap shall be determined by using probes of various widths to accurately measure the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance; 4) Add the gap surface area of each gap location for the

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primary seal and the secondary seal individually. Divide the sum for each seal by the nominal diameter of the tank. [40 CFR 60.113a(a)(1)(ii) and (iii)]

29. If the accumulated area of gaps or gap width exceed limits, operator shall submit a report to the APCO within 60 days of the date of measurement. Report should include identification of the vessel, reason vessel did not meet the specifications, and a description of the actions necessary to bring the storage vessel into compliance. [40CFR 60.113a(1)(i)(E)]

30. True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-82 modified by maintaining the hot water bath at storage temperature. Where storage temperature is above 100 °F true vapor pressure shall be determined by Reid vapor pressure at 100 °F and ARB approved calculations. [District Rule 4623, 6.2.2]

31. True vapor pressure of crude oil with an API (American Petroleum Institute) gravity less than 30°, as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990. [District Rule 4623, 6.2.3]

32. Maximum true vapor pressure may be determined from nomographs contained in API Bulletin 2517, by using the typical Reid vapor pressure and the maximum expected storage temperature of the stored product, unless the APCO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40CFR 60.115a(b)]

33. Operator shall determine the true vapor pressure of each type of crude oil with a Reid vapor pressure less than 2.0 psia or whose physical properties preclude determination by the recommended method from available data and record if the true vapor pressure is greater than 1.0 psia. [40CFR 60.115a(c)]

34. Compliance with permit conditions in the Title V permit shall be deemed compliance with 40CFR60 Subpart Ka and SJVUAPCD Rule 4623 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2]

35. The requirements of 40CFR60 Subpart K and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2]

36. The requirements of SJVUAPCD Rules 4661 (Amended December 17, 1992) and 4801 (Amended December 17, 1992), and 4623, Section 5.0 (Amended December 17, 1992) do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2]



## APPENDIX A

### EPA COMMENTS / DISTRICT RESPONSE FOR TEMPLATE # SJV-TK-15-0

## EPA COMMENTS / DISTRICT RESPONSE

The EPA's comments regarding tank templates are encapsulated below followed by the District's response. A copy of the EPA's 12/3/96 letter is available at the District.

### A. General Comments

#### 1. **EPA COMMENT**

*In all of the templates, the first paragraph should be revised to clarify that federally enforceable requirements in Title V permits will be enforceable not only by EPA and the public, but by the District as well.*

#### **DISTRICT RESPONSE**

The first paragraph of the templates will be reworded as follows:

Units may be subject to "federally enforceable" requirements as well as requirements that are enforceable by the "District-only." Federally enforceable requirements will be enforceable by the EPA, the District, and the public through Title V permit conditions identified as federally enforceable. District-only requirements represent local or state regulations for which the EPA has no direct enforcement authority. The final Title V permits issued by the District will contain both federally enforceable and District-only requirements.

#### 2. **EPA COMMENT**

*In template Series 1 to 10, the second paragraph of the applicable requirements should be revised so as to be consistent with the language in the other templates.*

#### **DISTRICT RESPONSE**

The second paragraph of these series will be revised to read as follows:

"District-only requirements are not addressed in this template except for those used in streamlining of multiple requirements. District-only requirements used in streamlining of multiple requirements will become federally enforceable. Table 1, Applicable Requirements, does not necessarily include all federally enforceable requirements that apply to tanks qualifying to use this template, and it is the source's responsibility to determine any and all applicable requirements to which the source is subject. Generally, requirements not addressed by this template are those that require a source-specific analysis, or are covered by other templates".

**3. EPA COMMENT**

*Rule 4623 is the renumbered version of District Rule 463.2, which is the SIP-approved version of the rule. Permit conditions must be referenced to this SIP rule. In the analysis section of the template, the District may wish to explain that Rule 463.2 is the equivalent SIP-approved version of Rule 4623.*

**DISTRICT RESPONSE**

The District will append a table to each template showing the rule numbers of the county SIP rules corresponding to the current District rules, and the permit conditions which show compliance with the provisions of those SIP rules. Also, in the compliance sections, it will be stated that Rule 4623 is a renumbering of the county SIP rules with no changes in requirements from those rules.

**4. EPA COMMENT**

*The suggestion is made to include the various MACT standards that contain provisions for storage vessels in the list of Category “B” rules.*

**DISTRICT RESPONSE**

Applicable MACT standards will be included in the list of Category “B” rules in current templates.

**5. EPA COMMENT**

*Include the adoption date of rules included in the permit shield.*

**DISTRICT RESPONSE**

Adoption dates of rules referenced in the templates will be included in the permit shields.

**6. EPA COMMENT**

*Any sections of applicable requirements not addressed in the templates must be excluded from the permit shields.*

**DISTRICT RESPONSE**

Affected sections will be excluded from the permit shields of these and all future templates.

**7. EPA COMMENT**

*A general condition should be included in the permit conditions that states the definitions in the rules cited as the origin and authority for each permit condition.*

**DISTRICT RESPONSE**

The District feels that the definitions in the rules are sufficient, as they were considered in previously approved templates. However, a condition will be added

to the umbrella template (SJV-UM-0-0) stating that all terms are used as defined in the cited underlying requirement unless otherwise explicitly defined within a particular permit condition.

**8. EPA COMMENT**

*Either the templates or the Title V permit must include a requirement that reports of required monitoring be submitted at least every 6 months.*

**DISTRICT RESPONSE**

Section 9.6.1 of District Rule 2520, as approved by EPA on 5/24/96, requires submittal of reports of any required monitoring at least every 6 months *unless a different frequency is required by an applicable requirement* (emphasis added). SJV-UM-0-0, the facility-wide template, includes a permit condition stating this requirement. Sources not using the facility-wide template will have this condition imposed in the Title V permit.

**9. EPA COMMENT**

*The cite for the origin and authority of each permit condition should be specific to the provision (i.e. subsection) of the rule so it is clear what portion of the applicable requirement is being addressed.*

**DISTRICT RESPONSE**

Cites have been revised to include applicable subsections of requirements.

**10. EPA COMMENT**

*The Template Qualification Forms (TQFs) for all tank templates ranging from Series 4 through Series 18 should include a question asking whether the tank is equipped with a pressure relief valve, as required by SIP Rule 463.2, and disallowing those units not so equipped from using the template.*

**DISTRICT RESPONSE**

The qualifier referenced above will be changed to read as follows:

“Is this a tank with a capacity of 84,000 gallons or less of a small producer (as defined in District Rule 4623) with a daily throughput of less than 6,300 gallons per day, and equipped with a pressure relief device set to within 10 percent of the maximum working pressure of the tank? If “no”, continue to next question; otherwise STOP - you cannot use this template”.

**11. EPA COMMENT**

*The compliance certification language must include the following language to be consistent with be consistent with part 70 requirements:*



*“Based on information and belief formed after reasonable inquiry 1) the information on this form is true, accurate, and complete and 2) the facility is in compliance with this template’s permit conditions.”*

**DISTRICT RESPONSE**

The templates will be submitted as part of a complete Title V application. The Title V application contains a Compliance Certification Form (TVFORM-005 in the SJVUAPCD Title V Permit Application Package). On the Compliance Certification Form the responsible official certifies the truth, accuracy, and completeness of the Title V application, including all supporting information.

**12. EPA COMMENT**

*The TQF should provide information on the origin and authority of the qualification terms.*

**DISTRICT RESPONSE**

Citations have been added where missing or expanded as required.

**13. EPA COMMENT**

*The District must be consistent with the underlying requirement when referring to capacity thresholds in the TQF.*

**DISTRICT RESPONSE**

Such references have been reviewed and revised where necessary to achieve consistency with the language in the underlying requirement.

**Series 15 Tanks**

***Applicability***

**1. EPA COMMENT**

*This section should be revised to reflect the applicability conditions on the cover page, i.e., that the template applies to tanks >40,000 gallons that are not used for petroleum or condensate processed, stored or treated prior to custody transfer and to any tank which has a storage capacity greater than 420,000 gallons.*

**DISTRICT RESPONSE**

The applicability conditions discussed in the above comment has been modified to the following:

tank has a storage capacity of greater than 40,000 gallons and is not used for petroleum or condensate stored processed or treat prior to custody transfer

tank has a storage capacity of 420,000 gallons or greater

**Permit Conditions**

**1. EPA COMMENT**

*Condition 19 must also require a maximum true vapor pressure, as in 40 CFR 60.115a(a).*

**DISTRICT RESPONSE**

The permit conditions discussed in the above comment has been modified to the following:

Operator shall keep a record of liquids stored in each container, period of storage, storage temperature, maximum true vapor pressure, and the Reid vapor pressure of such liquids.

**2. EPA COMMENT**

*Condition 24 should refer to floating roof tank, not fixed roof tank.*

**DISTRICT RESPONSE**

The reference has been added accordingly

**3. EPA COMMENT**

*Conditions 25-28, 29D, and 30 should cite to 40 CFR 60.113a, not 60.114a.*

**DISTRICT RESPONSE**

The references have been added accordingly

**4. EPA COMMENT**

*Condition 27 must specify that “subsequent refilling with petroleum liquid shall be considered initial fill for the purposed of conditions 25 and 26 of this template.”*

**DISTRICT RESPONSE**

The permit condition discussed in the above comment has been modified to the following:

If unit is out of service for a period of one year or more, subsequent refilling with petroleum liquid shall be considered initial fill in accordance with the conditions of this permit.

**5. EPA COMMENT**

*Condition 33 should clearly specify that the operator must record the “raw data obtained in the measurement process specified in conditions 29.A, 29.B, and 29.C and the calculations specified in conditions 29.C, and 29.D.*

**DISTRICT RESPONSE**

The permit condition discussed in the above comment has been modified to the following:

Operator shall record the vessel on which the measurement was performed, date of the seal gap measurement, and raw data obtained in the measurement process in accordance with the conditions of this permit.

**6. EPA COMMENT**

*Condition 30 must require that the report go to EPA as well as to the APCO*

**DISTRICT RESPONSE**

The District was given authority to implement and enforce Subpart Ka, the origin and authority for this condition, in a letter dated June 22, 1993 from EPA to Michael Scheible of the California Air Resources Board. There is no provision in this subpart prohibiting EPA from delegating to the states any authority therein. Therefore the District feels that it has the authority to act as the Administrator. Consequently the condition will not be changed.

**7. EPA COMMENT**

*Conditions 30 and 31 must refer to true vapor pressure, not total vapor pressure.*

**DISTRICT RESPONSE**

Both conditions have been modified to refer to the true vapor pressure rather than the total vapor pressure.

**8. EPA COMMENT**

*Conditions 33 and 34 should cite to 40 CFR 60.115a(b) and 60.115a(c), respectively.*

**DISTRICT RESPONSE**

The references have been added accordingly

**9. EPA COMMENT**

*Condition 33 should state “unless the APCO or Administrator specifically requests...”*

**DISTRICT RESPONSE**

The District was given authority to implement and enforce Subpart Ka, the origin and authority for this condition, in a letter dated June 22, 1993 from EPA to Michael Scheible of the California Air Resources Board. There is no provision in this subpart prohibiting EPA from delegating to the states any authority therein. Therefore the District feels that it has the authority to act as the Administrator. Consequently the condition will not be changed.

**10. EPA COMMENT**

*Pursuant to section 60.112a(a)(1), the template must also contain a condition that the process to emptying and refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.*

**DISTRICT RESPONSE**

The following permit conditions has been added:

Roof shall be floating on the liquid (i.e., off the roof leg supports) at all times except during initial fill and when tank is completely emptied and subsequently refilled. The process of emptying and refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

**11. EPA COMMENT**

*Pursuant to section 60.113a(a)(1)(iv), the template must require that the operator provide the APCO and the Administrator 30 days prior notice of the gap measurement to afford them opportunity to have an observer present.*

**DISTRICT RESPONSE**

The following condition has been added to the template:

Operator shall provide the APCO with 30 days notice of the gap measurement to afford the District the opportunity to have an observer present.

## APPENDIX B

### 463.2 SIP DISTRICT RULE / 4623 DISTRICT RULE COMPARISON FOR TEMPLATE # SJV-TK-15-0

# Template SJV-TK-15-0

	4623 SJVUAPCD	463.2 old SIP Rule
<b>EXEMPTIONS</b>		
<p>The requirements of this rule shall not apply to ;</p> <p>For any tank designated for emergency standby, in existence prior to May 1, 1979, and which stores exclusively petroleum distillate or crude oil. Prior to return to emergency standby status, each tank shall be thoroughly drained. Each use of the tank shall not exceed 30 days. After a tank has been used (filled or partially filled) and draining of the tank has begun, any further filling of the tank shall constitute a separate use of the tank. The tank shall be equipped with a pressure relief device set to within ten (10) percent of the maximum allowable working pressure of the tank.</p> <p>If the unit is a tank with a capacity of less than 84,000 gallons or less of a small producer with a daily throughput of less than 6,300 gallons per day, and equipped with a pressure relief device set to within 10 percent of the maximum allowable working pressure of the tank.</p> <p>Temporary tanks, with capacities of 21,000 gallons or less, left on site for six months or less.</p>	X	X
Tanks, reservoirs or other containers which are pressure vessels maintaining working pressures sufficient at all times to prevent organic liquid loss or VOC loss to the atmosphere.	X	X
If a new incineration device is required solely to comply with the requirements of this rule for existing tanks such device shall not be subject to the requirements of the New and Modified Stationary Source Review Rule provided the device includes BACT provisions for all air contaminants and the device is under District permit.	X	X
<b>REQUIREMENTS</b>		
Liquid stored has a TVP of 11 psia or greater under storage conditions	X	X
No person shall place, store or hold in any floating roof tank of 19,800 gallons or greater, any organic liquid unless such tank, is equipped with; 1) a floating roof consisting o a pontoon-type or double-deck-type cover, 2) a closure device between the tank shell and roof edge consisting of two seals.	X	X
Seal designs shall be submitted to the APCO and shall not be installed or used unless they are approved by the APCO as meeting the criteria set forth in the following.	X	X
<p>Metallic-shoe-type, welded tanks;</p> <p>No gap between the tank and primary seal shall not exceed 1 1/2 inches. The cumulative length of all gaps greater than 1/2 inch shall not exceed 10% of the circumference of the tank. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of tank circumference. No continuous gap greater than 1/8 inch shall exceed 10% of the tank circumference.</p>	X	X
No gap in the secondary seal shall exceed 1/2 inch. The cumulative length of all gaps greater than 1/8 inch shall not exceed 5% of the tank circumference.	X	X

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<p>If the primary seal is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 24 inches above the stored liquid surface.</p>	X	X
<p>If the primary seal is a metallic-shoe-type seal, then the geometry of the shoe shall be such that the maximum gap between the shoe and the tank shell is no greater than double the gap allowed by the seal gap criteria for a length of at least eighteen inches in the vertical plane above the liquid surface.</p>	X	X
<p>The secondary seal shall allow easy insertion of probes up to one and one-half (1-1/2) inches in width in order to measure gaps in the primary seal.</p>	X	X
<p>Secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal.</p>	X	X
<p>Metallic-shoe-type seal, riveted tank; No gap between the tank and primary seal shall not exceed 2 1/2 inches. The cumulative length of all gaps greater than 1 1/2 inch shall not exceed 10% of the circumference of the tank. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of tank circumference. No continuous gap greater than 1/8 inch shall exceed 10% of the tank circumference.</p>	X	X
<p>No gap in the secondary seal shall exceed 1/2 inch. The cumulative length of all gaps greater than 1/8 inch shall not exceed 5% of the tank circumference.</p>	X	X
<p>If the primary seal is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 24 inches above the stored liquid surface. If the primary seal is a metallic-shoe-type seal, then the geometry of the shoe shall be such that the maximum gap between the shoe and the tank shell is no greater than double the gap allowed by the seal gap criteria for a length of at least 18 inches in the vertical plane above the liquid surface.</p>	X	X
<p>There shall be no holes or tears in, or openings in the envelope surroundings the annular vapor space enclosed by the roof edge, stored liquid surface, shoe, and seal fabric.</p>	X	X
<p>The secondary seal shall allow easy insertion of probes up to one and one-half (2-1/2) inches in width in order to measure gaps in the primary seal.</p>	X	X
<p>Secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal.</p>	X	X
<p>Resilient toroid type seal; No gap between the tank and primary seal shall not exceed 1/2 inches. The cumulative length of all gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. No continuous gap greater than 1/8 inch shall exceed 10% of the tank circumference</p>	X	X
<p>No gap in the secondary seal shall exceed 1/2 inch. The cumulative length of all gaps greater than 1/8 inch shall not exceed 5% of the tank</p>	X	X

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<p>circumference.</p> <p>There shall be no holes or tears in, or openings in the envelope surrounding the annular vapor space enclosed by the roof edge, stored liquid surface, shoe, and seal fabric.</p> <p>The secondary seal shall allow easy insertion of probes up to one and one-half (1/2) inches in width in order to measure gaps in the primary seal.</p> <p>Secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal.</p> <p>The primary seal envelope shall be made available for unobstructed inspection by the APCO on an annual basis at locations selected along its circumference at random by the APCO. In the case of riveted tanks with toroid-type seals, a minimum of 8 locations shall be made available; in other cases a minimum of 4 locations shall be made available. If the APCO suspects a violation may exist the APCO may be necessary to determine the seal condition for its entire circumference.</p> <p>All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10 percent of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal, or lid. The cover, seal, or lid shall at all times be in a closed position, with no visible gaps and be gas-tight, except when the device or appurtenance is in use. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Emissions from gauging or sampling device covers in excess of this limit shall be considered a leak.</p> <p>Each roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.</p> <p><u>Fixed roof tanks with internal floating roof</u> Liquid stored has a TVP of 11 psia or greater under storage conditions</p> <p>No person shall place, store or hold in any floating roof tank of 19,800 gallons or greater, any organic liquid, light crude oil or petroleum distillate unless the internal floating roof is equipped with; 1) a floating roof consisting of a pontoon-type or double-deck-type cover, 2) a closure device between the tank shell and roof edge consisting of two seals.</p> <p><u>Fixed roof tanks with vapor recovery system</u> No person shall place, store or hold in any floating roof tank of 19,800 gallons or greater, any organic liquid, light crude oil or petroleum distillate unless the tank is equipped with a vapor loss prevention system, consisting of a system capable of collecting all VOC's, and a system for processing and for return to the storage or disposal of VOC's, so as to prevent their emission to the atmosphere at an efficiency of at least 95% by weight.</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p>
<p>Any tank gauging or sampling device on a tank vented to the vapor recovery shall have gas-tight covers and closed at all times except during gauging or sampling.</p> <p>All piping, valves and fittings shall be in a gas-tight conditions.</p> <p>Storage in any above-ground tank of 19,800 gallons or less of gasoline unless</p>	<p>X</p> <p>X</p>	<p>X</p> <p>X</p>



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tank is equipped with a pressure relief device set to within 10% of the maximum allowable working pressure of the container or is equipped with a vapor loss control device which complies with the requirements of the above rules.	X	X
<b>TEST METHODS</b>		
True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-82 modified by maintaining the hot water bath at storage temperature. Where storage temperature is above 100°F true vapor pressure shall be determined by Reid vapor pressure at 100°F and ARB approved calculations.	X	X
True vapor pressure of crude oil with an API (American Petroleum Institute) gravity less than 30°, as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990.	X	X
Control efficiency shall be determined by a comparison of controlled emissions to those emissions which would occur from a fixed or cone roof tank in the same product service without a vapor recovery system. Emissions shall be determined based on tank emission factors in EPA Publication AP-42, component counts for fugitive emissions sources, recognized emission factors for fugitive emission sources and the efficiency of any VOC destruction device.	X	X
The efficiency of any VOC destruction device shall be measured by EPA Method 25, 25a, or 25b, and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422.	X	X
<b>RECORDKEEPING</b>		
Keep an accurate record of liquids stored in each container, storage temperature of the Reid vapor pressure of such liquids.	X	X
Emergency standby tanks are exempt from the requirements of the requirements of the rule for floating roof tanks. Records shall be maintained as required by the rule and the date(s) liquid is first introduced to each tank and date(s) tank is fully drained. Such records shall be submitted to the APCO 60 days prior to permit renewal.	X	X
for tanks exempt to this rule the owner shall maintain monthly records of average daily throughout and shall submit such information to the APCO 30 day prior to annual permit renewal.	X	X

APPENDIX C

TEMPLATE QUALIFICATION FORM  
FOR  
TEMPLATE # SJV-TK-15-0

# Template SJV-TK-15-0

## Title V General Permit Template Qualification Form

District Permit # \_\_\_\_\_

Please answer the questions in the table below. A fixed roof tank (unit) which meets the criteria of this table is qualified to use this template as part of a Title V application. To use this template, remove this sheet and attach to application.

Yes	No	Description of Qualifying Units
		Is this unit equipped with an external floating roof and used for the storage of petroleum liquids? [40CFR60.112a(a)(1)] If "yes", continue to next question; otherwise STOP - you cannot use this template.
		Does this unit have a storage capacity greater than 40,000 gallons and <b>not</b> used for petroleum or condensate processed, stored, or treated prior to custody transfer <b>OR</b> does the unit have a storage capacity greater than 420,000 gallons? [40CFR60.110(a)] If "yes", continue to next question; otherwise STOP - you cannot use this template
		Was construction, modification, or reconstruction commenced on this unit after May 18, 1978, and prior to July 23, 1984? [40CFR60 subpart Ka] If "yes" continue to next question; otherwise STOP - you cannot use this template.
		Is the true vapor pressure of the petroleum liquid as stored greater than 1.5 psia and less than 11.1 psia? [40CFR60.112(a)(1)] If "yes", continue to next question; otherwise STOP - you cannot use this template.
		Does this unit store organic materials which are liquid at standard conditions and which are used as solvents, viscosity reducers, or cleaning agents? [District Rule 4661, 4.1] If "no", continue to next question; otherwise STOP - you cannot use this template.
		Is this unit located at a heavy oil test station in Kern County? [District Rule 4404] If "no", continue to next question; otherwise STOP - you cannot use this template.
		Is this vessel exempt from the requirements of Rule 4623 Sections 5.1, 5.2, and 5.3 by the criteria listed in Rule 4623 Section 4.2.1 or 4.2.2? If "no" you cannot use this template; otherwise you qualify to use this template.

Based on information and belief formed after reasonable inquiry 1) the information on this form is true, accurate, and complete and 2) the facility is in compliance with this template's permit conditions:

\_\_\_\_\_  
Signature of Responsible Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name of Responsible Official (Please Print)

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